



ROY ROMER
Governor

PATRICIA A. NOLAN, MD, MPH
Executive Director

Hazardous Materials and Waste Management Division
4210 East 11th Avenue
Denver, Colorado 80220-3716
(303) 331-4830 / FAX (303) 331-4401

Telefax Numbers:
Main Building, Denver
(303) 322-9076

Parmigan Place, Denver
(303) 320-1529

First National Bank Building, Denver
(303) 355-6559

Grand Junction Office
(303) 248-7198

Pueblo Office
(719) 543-8441

April 10, 1992

Mr. Frazer Lockhart
U. S. Department of Energy
Rocky Flats Office
P.O. Box 928
Golden, Colorado 80402-0928



Dear Mr. Lockhart,

The Colorado Department of Health, Hazardous Materials and Waste Management Division (the Division), very much appreciated being invited to the planning meeting held in your office on April 8, 1992 regarding a possible IM/IRA for the Protected Area (PA). The opportunity you afforded us to be in on the ground floor will be, we believe, helpful to all parties.

A concept emerged at the April 8, 1992 meeting which has far reaching implications for successful IAG implementation. The concept is the suspension of all RI/RFI work within the PA (with the exception of OU 4 and a small portion of OU 6) until such time as access into the PA is no longer restricted and working conditions are simplified. This RFI/RI work would be replaced with a Protected Area IM/IRA. We are aware that, even though this IM/IRA is formative, decisions are being made (and, indeed, have already been made) that affect the ability of DOE to meet existing RFI/RI milestones for OUs in the PA. We believe this decision-making presupposes agency approval of the IM/IRA concept. Presently, we remain unconvinced that there is justification for suspension of RI/RFI work within the PA. We are very concerned that, as has happened in the past, formal submittal of the IM/IRA concept will not occur until the RFI/RI milestones become impossible to meet.

Therefore, we strongly urge DOE to present these concepts, and the ramifications to the IAG, for agency consideration as soon as possible. Any delay limits the options that are available to the agencies. Further, in the interim, DOE must make every effort to meet all RFI/RI milestones for OUs within the PA. Requests to suspend or significantly delay RFI/RI milestones resulting from a DOE concept that has not won agency approval will not be granted because these requests are not based on good cause.

ADMIN RECORD

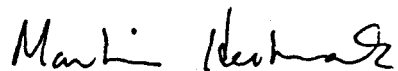
A-DU04-000142

If you have any questions regarding these matters, please call Joe Schieffelin of my staff at 331-4421.

Sincerely,



Gary W. Baughman
Unit Leader, Hazardous Waste Facilities
Hazardous Materials and Waste Management Division



Martin Hestmark
Manager, Rocky Flats Project
Environmental Protection Agency

cc: Daniel S. Miller, AGO
Martin Hestmark, EPA
Paul Bunge, EG&G
Barbara Barry, RFPU